## SEGEG ROCKY FLATS

EG&G ROCKY FLATS, INC. ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORAL

March 12, 1993

93-RF-3039

Richard J. Schassburger Acting Director Environmental Restoration Division DOE, RFO

TRANSMITTAL OF SOPS AND RESPONSE TO COMMENTS - MBA-030-93

Ref: J. K. Hartman Itr (01803) to R. Benedetti, Standard Operating Procedures (SOPs), February 12, 1993

The actions requested in the above-referenced letter have been assigned to Remediation Project Management for completion. The revised version of the High Purity Germanium (HPGe) Standard Operating Procedures (SOPs) titled "In-Situ Characterization for Radionuclides Using High Purity Germanium Detectors", SOP GT.30, Rev. 0., and a response to comments was delivered to the Department of Energy (DOE) for transmittal to the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH) on March 8, 1993. EG&G Rocky Flats, Inc. (EG&G) technical staff assures that this SOP addresses the comments received from the State of Colorado with the understanding that EG&G will produce a document titled "Compendium of In-Situ Radiological Characterization Methods and Analysis" which will serve to fill in any background information that the regulatory agencies need, but which does not belong in the SOP. The draft of the document is due to the regulatory agencies by April 2, 1993.

The SOP "Autonomous Operation of the Global Position System", SOP GT.27, has been reviewed in light of EPA's comments submitted on September 16, 1993. No changes to the SOP were made. The response to comment document is attached to this letter.

The SOP GT.31, Field Use of Tensiometers, has been modified to reflect the comment received from CDH on December 28, 1992. A revised copy is attached. In response to EPA's comments received on February 1, 1993, a proposal to automate the Field Use of the Tensiometers is included. The automation of the tensiometer network that is described in the attached proposal will be conducted under the Scientific Notebook SOP 3-21000-ADM-5.10. Conversion factors and the type of chemical to be used as antifreeze will be assessed and selected this summer as outlined in the proposal.

The SOP GT. 22, In-Situ Sampling with BAT System, required more work to address additional comments that were received from EG&G technical staff. The revision asked for by the Colorado Department of Health has been incorporated. A revised version of the SOP is included along with a response to comment document.

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We acknowledge that work remains on the following SOPs outlined in your letter:

- Vertical Soil Profiles for the HPGe
- Collection of Surficial Soil Samples (per Technical Memorandum No. 5 for OU 1)
- Collection of Surficial Soil Samples Below Paved Areas
- Soil Coring from Five Foot Depth to Confirm Soil Gas Surveys
- Use of Colorimeteric Techniques to Determine Concentrations of Inorganic Parameters in Water
- Tank/Pipeline Inspection
- Tank/Pipeline Testing
- Tank/Pipeline Residue Sampling
- Collection of Surficial Soils (Root Zone) for Use in the Ecological Risk Assessment Process
- Collection of Wipe and Pavement Samples for PCB's
- Steam Rinsate Sampling for Characterization in OU 15

In addition to the SOPs that you have requested, we are developing the following SOPs:

- Asphalt Sampling and Analysis
- Laboratory Application of the HPGe

These SOPs are developed to support the Stage I non-invasive screening activities for the integrated industrial area Operable Units (OUs 8, 9, 10, 12, 13 and 14). The current schedule shows that we will submit a draft Integrated Field Sampling Plan on or before May 5, 1993 for DOE and regulatory agency comment. This plan will include these SOPs.

EG&G technical staff will work closely with DOE to ensure that these procedures reflect our current needs and will meet the requirements of the Environmental Restoration Management Quality Assurance group.

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If you have questions regarding this response, please contact M. F. McHugh of Remediation Project Management at extension 8624.

M. B. Arndt Director

**ERM/Remediation Project Management** 

MFM:dmf

Orig. and 1 cc - R. J. Schassburger

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